

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TRUSTEES OF THE PLUMBERS LOCAL UNION NO.
1 WELFARE FUND, TRADE EDUCATION FUND,
401(K) SAVINGS PLAN,

Plaintiffs,

-against-

SPRAY IN PLACE SOLUTIONS, LLC and ATLANTIC
SPECIALTY INSURANCE COMPANY,

Defendants.

24 CV 2568 (KAM) (PK)

**DECLARATION OF
ADRIANNA R.
GRANCIO, ESQ.
IN SUPPORT OF
MOTION TO
WITHDRAW AS
COUNSEL**

ADRIANNA R. GRANCIO, ESQ. declares:

1. I am admitted to the Bar of this Court and am a Partner with the law firm of Virginia & Ambinder, LLP (“V&A”), attorneys for Plaintiffs in this action. As the attorney responsible for this matter, I am familiar with the facts of this case and its procedural history and thus have sufficient knowledge to make this Declaration.

2. I submit this declaration in support of V&A’s motion to withdraw as counsel for Plaintiffs Trustees of the Plumbers Local Union No. 1 Welfare Fund, Trade Education Fund, 401(k) Savings Plan (collectively, the “Plaintiffs”).

3. Plaintiffs commenced this action on April 5, 2024. *See* ECF Doc. No. 1.

4. On April 30, 2025, the Court issued an Order extending the time to complete discovery through July 29, 2025. *See* ECF Order Runner dated April 30, 2025.

5. The parties were also ordered to submit a joint status report to the Court certifying the close of discovery by July 29, 2025. *Id.*

6. V&A and the Plaintiffs have mutually agreed to terminate the terminate the attorney-client relationship.

7. The Plaintiffs have freely and knowingly consented to this termination and have retained new counsel from the law firm of O'Donoghue & O'Donoghue, LLP ("O'Donoghue"). A Stipulation of Substitution of Counsel is attached hereto as **Exhibit A**.

8. O'Donoghue has confirmed that it does not intend to seek modification of any existing deadlines or dates for court appearances in this case. A copy of correspondence with O'Donoghue is attached hereto as **Exhibit B**.

9. Counsel for Defendants Spray in Place Solutions, LLC and Atlantic Specialty Insurance Company (collectively, the "Defendants") has no objection to the motion to withdraw. A copy of correspondence with counsel for Defendants is attached hereto as **Exhibit C**.

Executed on: June 30, 2025

VIRGINIA & AMBINDER, LLP

/s/ Adrianna R. Grancio
Adrianna R. Grancio, Esq.
40 Broad Street, 7th Floor
New York, New York 10004
(212) 943-9080
agrancio@vandallp.com
Attorneys for Plaintiffs